

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE, INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,

Defendants.

Civil Action No.: 2:21-cv-310

**DECLARATION OF LEONARD J. CIMINI IN SUPPORT OF DEFENDANTS’
OPPOSED MOTION TO TRANSFER VENUE TO THE DISTRICT OF DELAWARE**

I, Leonard J. Cimini, declare and state as follows:

1. My name is Dr. Leonard J. Cimini, Jr. I am an expert in the field of telecommunications technology, including Direct Subscriber Line (“DSL”) transmission technology. I have been asked by CommScope Holding Company, Inc., CommScope, Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology, Inc., and ARRIS Enterprises, LLC (collectively, “CommScope”) to provide this declaration in support of CommScope’s Opposed Motion to Transfer Venue to the District of Delaware. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would competently testify to the matters set forth herein.

2. My domicile is in Delaware. I am the primary caregiver for my wife who has been ill for years. In August 2021, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

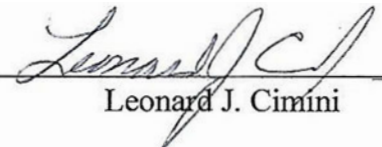
[REDACTED]

3. Traveling to Texas would be very burdensome for me because I am the primary caregiver for my wife. If I were required to travel to Texas, I would not be able to be present to manage my wife's care, provide some care in the nursing facility, or visit her every day.

4. I was previously retained by 2Wire, Inc. ("2Wire") to act as an expert witness in *TQ Delta, LLC v. 2Wire, Inc.*, No. 13-cv-01835-RGA (D. Del.). I was able to actively participate in the aforementioned case without significant difficulties. While I have not yet had to attend trial in the Delaware case because trial for the "Family 4" patents that I provided opinions on has not been set, it would be convenient for me to drive to the federal courthouse located in Wilmington, Delaware. I would also be able to offer normal care for my wife in Philadelphia. The same would be true if the jury trial in this matter took place in the District of Delaware.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Dated: January 29, 2022

By: 
Leonard J. Cimini